



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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November 12, 2019

**BY ECF**

Honorable Robert M. Levy  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 10007

Re: Devan Billups v. City of New York, et al.  
18 CV 4023 (ARR) (RML)

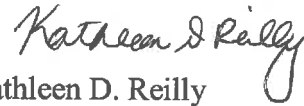
Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney for defendant City of New York in this matter. Defendant writes jointly with plaintiff's counsel, Alan Levine, to respectfully request a three-month extension of time, from November 15, 2019 to February 15, 2019, to complete discovery in this matter.

By way of background, plaintiff bring this action, pursuant to 42 U.S.C. § 1983, alleging that, on or about April 21, 2017, while he was in New York City Department of Correction custody, he was subjected to violations of his Fourteenth Amendment rights, including, *inter alia*, deliberate indifference to medical needs, negligence, and negligent training and supervision. During the past several months, the parties have been actively engaged in discovery. Defendant responded to plaintiff's First and Second Demands for Production of Documents; plaintiff responded to defendant's Identification Interrogatories and to the City's First Set of Interrogatories and Request for Production of Documents. In addition, plaintiff was deposed on November 8, 2019. Upon receiving plaintiff's responses to defendant's discovery demands, however, this Office recently received additional medical releases for previously undisclosed providers. These additional providers also were identified by plaintiff during his deposition. As such, in order to obtain the additional records in response to the releases provided, and to complete the additional discovery requests made by defendant during plaintiff's deposition, the parties respectfully request a three-month extension of time to complete discovery, from November 15, 2019 to February 15, 2019.

The parties thank the Court for its time and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kathleen D. Reilly".

Kathleen D. Reilly  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: **BY ECF**  
Alan D. Levine, Esq., *Attorney for Plaintiff*